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REMARKS

Claims 1-33 are currently pending in the subject application and are presently under consideration. A listing of the claims is at pages 2-7. Claims 1, 5, 6, 22, 29 and 30 have been amended and claim 4 has been cancelled herein. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-4, 6, 7, 10, 11, 21, 22, 25-27 and 29-32 Under 35 U.S.C. §102(e)

Claims 1-4, 6, 7, 10, 11, 21, 22, 25-27 and 29-32 stand rejected under 35 U.S.C. §102(e) as being anticipated by Belani *et al.* (US 6,772,350). Applicants' representative respectfully requests withdrawal of this rejection for at least the following reasons. Belani *et al.* does not disclose or suggest each and every element of applicants' invention recited in the subject claims.

A single prior art reference anticipates a patent claim only if it *expressly or inherently describes each and every limitation* set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). *The identical invention must be shown in as complete detail as is contained in the... claim.* *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). (emphasis added).

The claimed invention relates to an enhanced security model in accordance with hierarchically arranged data items. In particular, independent claim 1 recites a data store that includes at least one hierarchical data structure that comprises a plurality of data items and *a security component that applies at least a first security policy to at least a first subsection of the data store and at least a second variant security policy to at least a second disparate subsection of the data store.* Independent claims 22, 29 and 30 recite similar limitations. Belani *et al.* is silent regarding such novel features of the subject claims.

Belani *et al.* discloses an access controller that manages accessibility to various resources in a multi-domain server and/or network. Belani *et al.* applies a security access list to resources, a hierarchy associated with the resources, and/or user hierarchy information in order to provide secure access to the plurality of resources in their entirety. (See col. 6, lines 51-55). Yet, the cited reference applies the access list to the entire resource without contemplating applying

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separate security policies within the same resource. In particular, Belani *et al.* states that the resource can be a file or a database, yet the resource security is applied to the entire resource - no section or region is defined and/or utilized to provide different security policies within disparate subsections of the data store. (See col. 7, lines 1-4). By applying a ***first security policy to at least a first subsection of the data store and at least a second security policy to at least a second subsection of the data store***, the claimed invention significantly increases database performance. As a result of utilizing conventional techniques of propagating a security file separately to each data item within the database, Belani *et al.* is silent with regard to a ***security component that applies at least a first security policy to at least a first subsection of the data store and at least a second variant security policy to at least a second disparate subsection of the data store***, as is afforded by the claimed invention.

In view of at least the foregoing comments, it is readily apparent that Belani *et al.* does not teach or disclose each and every limitation of the independent claims 1, 22, 29, and 30 (and the claims that depend there from). Accordingly, applicants' representative respectfully requests withdrawal of this rejection.

III. Rejection of Claims 5, 12-17, 23, 24 and 28 Under 35 U.S.C. §103(a)

Claims 5, 12-17, 23, 24 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Belani *et al.* in view of Dennis *et al.* (US 6,466,932). Applicants' representative respectfully requests withdrawal of this rejection for at least the following reasons.

Claims 5, 12-17, 23, 24 and 28 depend from independent claims 1 and 22, and as stated *supra*, Belani *et al.* does not teach, disclose or suggest applicants' invention as recited in such independent claims; and Dennis *et al.* does not cure the aforementioned deficiencies of the primary reference. Accordingly, this rejection should be withdrawn.

IV. Rejection of Claim 8 Under 35 U.S.C. §103(a)

Claim 8 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Belani, *et al.* in view of applicants' alleged admittance of prior art. Applicants' representative respectfully requests the rejection be withdrawn for the following reasons.

The subject claim depends from independent claim 1, and as previously discussed, Belani *et al.* does not teach or suggest all limitations of claim 1. The alleged admitted prior does not

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compensate for the aforementioned deficiencies of Belani *et al.* Therefore, applicants' representative respectfully requests this rejection be withdrawn.

V. Rejection of Claims 9 and 20 Under 35 U.S.C. §103(a)

Claims 9 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Belani, *et al.* in view of applicants' alleged admittance of prior art and further in view of Dennis, *et al.* This rejection should be withdrawn for at least the following reasons.

Claims 9 and 20 depend from independent claim 1. As stated *supra*, Belani *et al.* and the alleged admitted prior art do not teach, disclose or suggest applicants' invention as recited in independent claim 1; and Dennis *et al.* does not cure the aforementioned deficiencies of the primary references. Applicants' representative respectfully requests withdrawal of this rejection.

VI. Rejection of Claims 18, 19 and 33 Under 35 U.S.C. §103(a)

Claims 18, 19 and 33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Belani *et al.* in view of Sandler *et al.* (US 2003/0217033). Applicants' representative respectfully requests the rejection be withdrawn for the following reasons.

As stated *supra*, Belani *et al.* does not teach, disclose or suggest applicants' invention as recited in independent claims 1 and 30 (from which claims 18, 19, and 30 depend from); and Sandler *et al.* does not cure the aforementioned deficiencies of the primary references. This rejection should be withdrawn.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP535US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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